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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

Feb 11, 2025

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

No. 4:25-CR-06003-SAB-1

v.

**PROTECTIVE ORDER**

MANUEL ANTONIO RODRIGUEZ,

Defendant.

Before the Court is the parties' Stipulation for Protective Order Regarding Identification of Minor Victim Pursuant to 18 U.S.C. § 3509, ECF No. 21, and related Motion to Expedite, ECF No. 22. Defendant is represented by Dennis Alan Hanson. The Government is represented by Laurel Holland. The motions were considered without oral argument. Good cause exists to grant the motions.

Accordingly, **IT IS ORDERED:**

1. The parties' Motion to Expedite, ECF No. 22, is **GRANTED**.  
2. The parties' Stipulation for Protective Order Regarding Identification of Minor Victim Pursuant to 18 U.S.C. § 3509, ECF No. 21, is **GRANTED**.

3. Good cause having been shown, the Court hereby enters this Protective Order governing discovery proceedings in this matter. Documents or information disclosed in discovery that a party or non-party reasonably and good faith believes to be confidential as set forth herein can be designated as confidential as set forth herein. **Nothing in this Order affects the applicable legal**

**PROTECTIVE ORDER # 1**

1 **standards for the sealing of materials actually filed with the Court.**

- 2 1. The privacy protection measures mandated by 18 U.S.C. § 3509(d), which  
3 apply when a case involves a person under the age of eighteen years who  
4 is alleged to be a victim of a crime of sexual exploitation, or a witness to a  
5 crime committed against another person, apply to this case.
- 6 2. All persons acting in this case in a capacity described in 18 U.S.C. §  
7 3509(d)(1)(B), shall:
  - 8 a. Keep all documents that disclose the names, identities, personal  
9 identifying information (“PII”) or any other information concerning  
10 minors in a secure place to which no person who does not have  
11 reason to know their contents has access;
  - 12 b. Disclose such documents or the information in them that concerns  
13 minors only to persons who, by reason of their participation in the  
14 proceeding, have reason to know such information;
  - 15 c. Not permit Defendant to review discovery outside the presence of  
16 defense counsel or a defense investigator;
  - 17 d. Not permit Defendant to keep discovery in their own possession  
18 outside the presence of defense counsel or a defense investigator;  
19 and
  - 20 e. Not permit Defendant to keep, copy, or record the identities of any  
21 minor or victim identified in discovery in this case.
- 22 3. All papers to be filed that disclose the names or any other information  
23 identifying or concerning minors shall be filed under seal without  
24 necessity of obtaining a court order, and that the person who makes the  
25 filing shall submit to the Clerk of the Court:
  - 26 a. The complete paper to be kept under seal; and
  - 27 b. The paper with the portions of it that disclose the names or other  
28 information identifying or concerning children redacted, to be

1 placed in the public record.

2

3 4. The parties and the witnesses shall not disclose minors' identities during

4 any proceedings connected with this case. The parties and witnesses will

5 refer to alleged minor victims only by using agreed-upon initials or

6 pseudonyms (e.g., "Minor 1"), rather than their bona fide names, in

7 motions practice, opening statements, during the presentation of evidence,

8 in closing arguments, and during sentencing.

9

10 5. The United States may produce discovery to Defendant that discloses the

11 bona fide identity, images, and PII of the alleged minor victim, in order to

12 comply with the United States' discovery obligations. Defendant, the

13 defense team, Defendant's attorney and investigator, and all of their

14 externs, employees, and/or staff members, shall keep this information

15 confidential as set forth above.

16

17 6. This Order shall apply to any attorneys who subsequently become counsel

18 of record, without the need to renew or alter the Order.

19

20 7. This Order shall apply to the bona fide identity, images, and PII of any

21 minors who are identified over the course of the case, whether or not such

22 minors are known to the United States and/or Defendant at the time the

23 Order is entered by the Court.

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1       4. The confidentiality obligations imposed by this Order shall remain in  
2 effect until the Court orders otherwise.

3       **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter  
4 this Order and to provide copies to counsel.

5       **DATED** this 11th day of February 2025.



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9       Stanley A. Bastian

10       Stanley A. Bastian  
11       Chief United States District Judge  
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